

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 17-10189-TPA
David Lee Ferrell, Jr AND	:	Chapter 13
Marian B Ferrell,	:	
Debtors	:	
	:	Related to Document No. 70
David Lee Ferrell, Jr.	:	
Movant	:	
	:	
v.	:	Hearing Date & Time:
	:	April 4, 2018 at 9:30 A.M.
M & T Bank,	:	
	:	
	:	
AND	:	
	:	
Ronda J. Winnecour/Esquire	:	
Chapter 13 Trustee,	:	
Respondents	:	

**NOTICE OF HEARING WITH RESPONSE DEADLINE REGARDING MOTION TO AUTHORIZE LOAN MODIFICATION**

**TO THE RESPONDENTS:**

You are hereby notified that the above Movant seeks an Order affecting your rights or property.

You are further notified to file with the Clerk and serve upon the undersigned attorney for Movants a response to the motion no later than **March 12, 2017**, i.e., seventeen (17) days after the date of service below, in accordance with the Federal Rules of Bankruptcy Procedure, Local Rules and Procedures of this Court, and the procedures of the Presiding Judge as found on the Judge's web page at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely respond, the Motion may be granted by the Court by default without a hearing.

You should take this to your lawyer at once.

A hearing will be held **April 4, 2018 at 9:30 A.M.** before the Honorable Judge Thomas P. Agresti at the Erie Bankruptcy Courtroom, U.S. Courthouse, 17 South Park Row, Erie, PA 16501. Only a limited time of 10 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled at a later date by the Court. An order granting the relief sought may be entered and the hearing may not be held if you do not timely file and serve a written response.

Date: February 23, 2018

Respectfully submitted,  
/s/ Daniel P. Foster, Esquire  
Daniel P. Foster  
PA I.D. # 92376  
Foster Law Offices, LLC  
PO Box 966  
Meadville, PA 16335  
Phone: 814.724.1165  
Fax: 814.724.1158

**CERTIFICATE OF SERVICE**

I, Kathryn M. Schwartz, Paralegal of Foster Law Offices, LLC, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the *NOTICE OF HEARING WITH RESPONSE DEADLINE REGARDING MOTION TO AUTHORIZE LOAN MODIFICATION* and *MOTION TO AUTHORIZE LOAN MODIFICATION* by First Class, US Mail, Postage-Pre Paid on the parties below.

Executed on: **February 23, 2018**

By: /s/ Kathryn M. Schwartz  
Kathryn M. Schwartz, Paralegal  
FOSTER LAW OFFICES, LLC  
PO Box 966  
Meadville, PA 16335  
Tel 814.724.1165  
Fax 814.724.1158

Ronda J. Winnecour, Trustee  
[cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)

Office of the United States Trustee  
[Ustregion03.pi.ecf@usdoj.gov](mailto:Ustregion03.pi.ecf@usdoj.gov)

M & T Bank  
PO Box 844  
Buffalo, NY 14240

David & Marian Ferrell  
PO Box 60  
Wattsburg, PA 16442